

Sean P. Nalty, CA Bar No. 121253
sean.nalty@ogletreedeakins.com
Shivani Nanda, CA Bar 253891
shivani.nanda@ogletreedeakins.com
Cara F. Barrick, CA Bar No. 303107
cara.Barrick@ogletreedeakins.com
OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
Steuart Tower, Suite 1300
One Market Plaza
San Francisco, CA 94105
Telephone: 415.442.4810
Facsimile: 415.442.4870

Attorneys for Defendant NORTHWESTERN MUTUAL LIFE
INSURANCE COMPANY

James P. Keenley, CA Bar No. 253106
Brian H. Kim, CA Bar No. 215492
Emily A. Bolt, CA Bar No. 253109
BOLT KEENLEY KIM LLP
1010 Grayson Street, Suite Three
Berkeley, CA 94710
Telephone: 510.225.0695
Facsimile: 510.225.1095

Attorneys for Plaintiff JOHN DOE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

JOHN DOE,

Plaintiff,

vs.

NORTHWESTERN MUTUAL LIFE
INSURANCE COMPANY,

Defendant.

Case No. 3:15-cv-05164-EMC

**STIPULATION AND PROPOSED ORDER
TO CONTINUE ADR COMPLETION
DEADLINE**

Action Filed: October 6, 2015
Trial Date: None Set
Judge: Hon. Edward M. Chen

The Parties to this matter, Plaintiff John Doe (“Plaintiff”) and Defendant The Northwestern Mutual Life Insurance Company (“Defendant”) (collectively “the Parties”), hereby request that the Court extend the June 17, 2016 date in this matter to complete mediation based on the following:

The Parties have worked together to obtain necessary medical documentation that is required to have a productive mediation in this matter. As a result of these efforts, the Parties need and additional 60 days to complete the mediation in this matter. Accordingly, the Parties stipulate and respectfully request a 60 day extension of the June 17, 2016 date to complete mediation in this matter. The parties hereby agree and stipulate that mediation in this matter shall now be completed on or before August 17, 2016. It is so stipulated.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED: June 16, 2016

BOLT KEENLEY KIM LLP

By: /s/ James P. Keenley

James P. Keenley
Brian H. Kim
Emily A. Bolt

Attorneys for Plaintiff JOHN DOE

DATED: June 16, 2016

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

By: /s/ Sean P. Nalty

Sean P. Nalty
Shivani Nanda
Cara F. Barrick

Attorneys for Defendant NORTHWESTERN
MUTUAL LIFE INSURANCE COMPANY

ATTESTATION

Pursuant to Local Rule 5-1(i)(1), I attest that concurrence in the filing of this document has been obtained from each of the other signatories.

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

Dated: June 16, 2016.

By: /s/ Sean P. Nalty
Sean P. Nalty

Attorneys for Defendant NORTHWESTERN
MUTUAL LIFE INSURANCE COMPANY

PURSUANT TO STIPULATION, IT IS SO ORDERED. The status conference is reset from 6/30/16 to 9/1/16 at 10:30 a.m. An updated joint status report shall be filed by 8/25/16.

DATED: June 20, 2016

Honorable Edward M. Chen
United States District Judge

